

REMARKS/ARGUMENTS

Reconsideration of this application is respectfully requested.

The Examiner is thanked for calling attention to a possible missing certified copy of a priority document. If the Examiner's comments are correctly understood, the only missing certified copy is of the applicant's European priority application 99305349.5 filed July 6, 1999. A certified copy of same is attached together with a separate cover letter requesting that such be made of record in this file.

The Examiner is requested to carefully review the record to insure that applicant has now perfected its priority claim and that no additional certified copies or other action is required.

As requested by the Examiner, a new more descriptive title has now been effected.

Similarly, the specification has been amended so as to insert suitable headings throughout.

In response to the rejection of claim 7 under 35 U.S.C. §112, second paragraph, claim 7 has been suitably amended so as to obviate this ground of objection.

The rejection of claims 1 and 6-10 under 35 U.S.C. §102 as allegedly anticipated by Huang et al. EP '304 is respectfully traversed.

Huang relates to prosodic databases that hold fundamental frequency templates for use in speech synthesis. An entry is created in a prosodic database to hold the sequence of weighted fundamental frequencies for units of speech. Each entry in the database is indexed by an associated tonal marking string. (See Huang at page 2, lines 24-25, lines 29-30 and page 5, lines 12-14). An example of a tonal marking string is shown on page 5, line 6.

The Examiner contends on page 4 of the Office Action that the tonal marking string of Huang can be equated with applicant's prosodic boundary information. This claim feature has now been amended to "prosodic phrase boundary information". It cannot be said that the content of the prosodic databases of Huang contain reference word sequences that include prosodic phrase boundary information. Rather the Huang prosodic databases hold a sequence of fundamental frequencies indexed by tonal marking strings. Neither a sequence of fundamental frequencies nor a tonal marking string can be reliably said to comprise a reference word sequence. Moreover the tonal marking strings of Huang are generated by applying a set of rules (see page 4, lines 53-54) and not by comparison with reference sequences that closely match the input sequence, as is required by independent claims 1, 7 and 8. For at least these reasons, independent claims 1, 7 and 8 are all novel over Huang.

Claims 6, 9 and 10 are all dependent on claim 1 and are therefore all novel over Huang at least by virtue of that dependency. With regard to claim 6, Huang also does not disclose reference word sequences that include prosodic phrase boundaries for the reason given above.

The rejection of claims 2-5 under 35 U.S.C. §103 as allegedly being made "obvious" based on Huang EP '304 in view of Hirschberg '262 is also respectfully traversed.

The fundamentally deficiencies of the primary reference to Huang EP '304 have already been noted above. The secondary reference to Hirschberg '262 do not supply those deficiencies. In addition, for reasons such as those noted below, it is not believed that Hirschberg even supplies the additional features asserted by the Examiner.

The Examiner contends that questions (3)-(6) found in column 5 of Hirschberg relate to "syntactical characteristics" and that the set of variable values 150 quantifies the degree of

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similarity between elements of a sentence. Applicant disagrees. The set of variable values 150 comprises a set of variable values for a potential intonational boundary site (see column 5, lines 6-14) and do not quantify the degree of similarity between syntactic characteristics of word clusters. Moreover questions (3)-(6) do not disclose questions relating to syntactical characteristics of words as contended by the Examiner, but rather, they relate to part-of-speech of words in a sentence (see column 6, line 19-21).

Accordingly, this entire application is now believed to be in allowable condition and a formal Notice to that effect is respectfully solicited.

Respectfully submitted,

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